



**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

D.T.C. 13-1

November 10, 2022

In the Matter of Telrite Corporation d/b/a Life Wireless Petition for Limited Designation as an Eligible Telecommunications Carrier in Massachusetts for the Limited Purpose of Offering Wireless Lifeline Service to Qualified Households.

**THIRD SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO TELRITE CORPORATION**

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable (“Department”) submits to Telrite Corporation the following information requests.

Instructions

The following instructions apply to this set of information requests, and all subsequent requests issued by the Department in this proceeding.

1. Unless otherwise stated, each request should be answered in writing and include: the case docket number; a reference to the request number; the name of the person responsible for the answer; and a recitation of the request.
2. Do not wait for all answers to be completed before supplying answers. Provide answers as soon as they are completed.
3. All answers should be filed with the Department by the close of business on December 2, 2022.
4. The term “Telrite” means Telrite Corporation d/b/a Life Wireless and its corporate predecessors, agents, officers, employees, and assigns.

5. The term “affiliate” means a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, Telrite. For purposes of this definition, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 percent.
6. The term “provide complete and detailed documentation” means: provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions Telrite used in developing the projections or estimates.
7. The term “ETC” means eligible telecommunications carrier.
8. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, legal filings, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
9. Requests shall be deemed continuing so as to require further supplemental responses if Telrite and/or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
10. If any of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

Requests

- | | |
|------------|--|
| D.T.C. 3-1 | Please identify each and provide examples of advertising from each social media platform Telrite intends to use for Lifeline advertising in Massachusetts. |
| D.T.C. 3-2 | Please provide complete and detailed documentation of Telrite’s market research for Massachusetts, including but not limited to any underserved groups or areas Telrite has identified and intends to target in Massachusetts. |
| D.T.C. 3-3 | Please explain how Telrite’s marketing strategy reaches underserved groups in Massachusetts. |
| D.T.C. 3-4 | Please provide additional reasons as to why designating Telrite as an ETC in Massachusetts is in the public interest. |